METHFESSEL & WERBEL, ESQS. 450 Seventh Avenue, Suite 1400 New York, NY 10123 (212) 947-1999 Attorneys for BMS Catastrophe, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK CARLOS ZAMORA AND MERCEDES ZAMORA,

Plaintiff.

-AGAINST-

150 BROADWAY CORP., 150 BROADWAY N.Y. ASSOCS. L. P., 25 BROADWAY OFFICE PROPERTIES LLC, ACTA REALTY CORP., ALAN KASMAN DBA KASCO, AMERICAN EXPRESS BANK, LTD, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., ANN TAYLORSTORES CORPORATION, AT&T WIRELESS SERVICES, INC., BAILEY N.Y. ASSOCIATES, BATTERY PARK CITY AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC., BFP TOWER C CO. LLC, BFP TOWER C MM LLC, BLACKMON-MOORING STEAMATIC CATASTOPHE, INC D/B/A BMS CAT, ETAL

Defendants.

INDEX NO.: 07 CV 01549

NOTICE OF ADOPTION OF ANSWER
TO MASTER COMPLAINT

PLEASE TAKE NOTICE THAT Defendant, BMS Catastrophe, Inc. s/h/a Blackmon-Mooring-Steamatic Catastophe, Inc. d/b/a BMS Catastrophe, by their attorneys, Methfessel & Werbel, as and for their response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint)

Related to the Master Complaint filed in the above referenced action, hereby

adopts their Answer and defenses to the Master Complaint, dated July 26,

2007, which was filed in the matter of: In Re World Trade Center Lower

Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

To the extent that Defendant's Answer to the Master Complaint does not

comprehensively address any of the specific allegations within the Check-Off

Complaint in the above captioned matter, Defendant, Defendant, BMS

Catastrophe, Inc., denies knowledge or information sufficient to form a belief as

to the truth of such specific allegations.

WHEREFORE, the defendant, Defendant, BMS Catastrophe, Inc.,

demands judgment dismissing the above captioned action as against them,

together with costs, disbursements and such other and further relief as this

Court deems just and proper.

DATED: New York, New York

April 23, 2008

METHFESSEL & WERBEL, ESQS.

Attorneys for Blackmon-Mooring-Steamatic Catastophe, Inc. d/b/a BMS

Catastrophe

Frank & Karon

By:__

CERTIFICATE OF MAILING

The undersigned hereby certifies as follows:

- 1. I am employed by the law firm of Methfessel & Werbel.
- 2. On April 23, 2008 the undersigned prepared and forwarded copies of the undersigned prepared and forwarded copies of the within Notice of Adoption , via ECF, to the following parties:

Worby Groner Edelman & Napoli Bern, LLP 5 Broadway, 12th Floor New York, NY 10006 Attorneys for: Plaintiff

All Defense Counsel

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Frank J. Keenan